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6 Counsel for Defendant VALERIAN DOBRE

7

8   IN THE UNITED STATES DISTRICT COURT

9   FOR THE NORTHERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,   )   No.   CR 07-00560 JSW
)
12   Plaintiff,   )
)   ~~[PROPOSED]~~ ORDER AND
13   v.   )   STIPULATION CONTINUING HEARING
)   DATE FROM FEBRUARY 28, 2008 TO
14 VALERIAN DOBRE,   )   MARCH 27, 2008 AND EXCLUDING
)   TIME FROM THE SPEEDY TRIAL ACT
15   Defendant.   )   CALCULATION UNDER 18 U.S.C.
    _____)   § 3161(h)(8)(A)

16

17

18   The undersigned parties stipulate as follows:

19 1. The parties in this matter are currently scheduled to appear before the Court for

20   status/change of plea on February 28, 2008 at 2:30 p.m.

21 2. Undersigned counsel for Mr. Dobre was appointed pursuant to a substitution of counsel

22   on January 28, 2008. While counsel has worked diligently in investigating the case since

23   that day, the parties agree that an additional month of investigation is warranted due to

24   the complexity of the matter and the need to arrange an interpreter for effective

25   communication with Mr. Dobre.

26 //

United States v. Valerian Dobre 07-00560 JSW
Stipulation and Order Continuing Status Hearing

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1   3.   The parties thus request that the matter be continued by four weeks from February 28,

2   2008 to March 27, 2008 at 2:30 p.m. Additionally, the parties agree that an exclusion of

3   time from February 28, 2008 to March 28, 2008 is appropriate under the Speedy Trial

4   Act, 18 U.S.C. § 3161(h)(8)(A). The parties agree that the fact-intensive nature of this

5   case and the need for an interpreter to effectuate attorney-client communications with Mr.

6   Dobre justifies additional time for effective preparation on the part of defense counsel.

7   IT IS SO STIPULATED.

8

9   DATED: February 27, 2008   _____/s/_____
                                                  CHRISTINA HUA
10   Assistant United States Attorney

11

12   DATED: February 27, 2008   _____/s/_____
                                                  ERIC MATTHEW HAIRSTON
13   Attorney for Defendant

14

15   ~~[PROPOSED]~~ **ORDER**

16   With the agreement of the parties, and with the consent of the defendant, the

17   Court enters this order (1) continuing the next appearance before this Court from February 28,

18   2008 to March 27, 2008; and (2) excluding time from February 28, 2008 to March 27, 2008

19   under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A).

20   **IT IS SO ORDERED.**

21

22   DATED: February 27, 2008   _____
                                        THE HON. JOSEPH S. WHITE
23   United States District Judge
                                        Jeffrey S. White

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United States v. Valerian Dobre 07-00560 JSW
Stipulation and Order Continuing Status Hearing

2